

March 12, 2014

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, NJ 08837

RE: Request for Information Pursuant to Section 104 of CERCLA
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

Dear Ms. Hriczko:

By January 9, 2014 letter ("Request") the U.S. EPA requested, pursuant to CERCLA Section 104(e), that Eckart America Corporation (Altana) ("Eckart") respond to questions regarding the Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey ("Superior Site"). Pursuant to email correspondence dated February 11, 2014, the U.S. EPA granted an extension of time to answer, with a required response date of March 17, 2014.

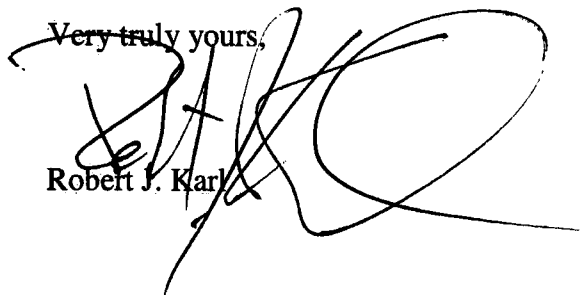
We want to thank you for your cooperation, time and effort in working with us regarding the specifics your Request. As I explained in my February 11, 2014 email, Eckart has had no involvement with Superior Barrel and Drum and our attached response to your Request will detail how Eckart has no ownership over the one (1) non-hazardous drum purported to have been found at the Superior Site. We are confident that the attached response will provide you with all necessary information pursuant to your Request and demonstrate that Eckart should not be categorized as a responsible party under CERCLA.

489767



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Should you have any questions or need additional information after reviewing the enclosed, please let me know.

Very truly yours,

Robert J. Karl

385/dl

Enclosures

cc: William Tucker, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

Eckart America Corporation (Altana)

March 12, 2014

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, NJ 08837

RE: Request for Information Pursuant to Section 104 of CERCLA
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

Dear Ms. Hriczko:

I am writing on behalf of Eckart America Corporation (Altana) ("Eckart"), located at 830 East Erie Street, Painesville, OH 44077 in response to the letter from U.S. EPA dated January 9, 2014 regarding the above-listed facility. Your letter requests information regarding transportation disposal storage of certain waste material at the Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey ("Superior Barrel Site"). In your letter you specifically request that Eckart investigate certain material to determine whether or not any waste had been taken or transported to the Superior Barrel Site. Once Eckart's investigation of the Superior Barrel Site documentation is complete, you requested that it provide the following information:

REQUEST FOR INFORMATION

General Information about the Company

1. a. State the correct legal name of the Company.

Response: ECKART America Corporation

-
- b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

Response: A Delaware Corporation

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c. State the name(s) and address(es) of the officer(s) of the Company.

Response: Anthony J. Ameo, Jr., President & CEO, 830 East Erie Street, Painesville, OH 44077
Mark H. Wallace, Vice President & CFO, 830 East Erie Street, Painesville, OH 44077

d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

Response: Parent Company:
ECKART GmbH
Guentersthal 4
Hartenstein, Germany 91235
Dr. Wolfgang Schuett, Chairman
Mr. Elmar Boeke

e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.

Response: See response 2. a., below.

f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

Response: N/A

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

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Response: Manufacturer of metal effect pigments in powder, paste and pellet form as well as metallic concentrates, dispersions, printing inks and pearlescent pigments. ECKART GmbH & Co Kg acquired Ohio Bronze Powder Company in 1973; later known as OBRON Atlantic Corporation. The name of the company changed to ECKART America L.P. in 1997 after the acquisition of Reynolds Metals Company in Louisville, KY. The name changed again in 2005 when ECKART GmbH was acquired by ALTANTA AG to ECKART America Corporation.

- b. Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

Response: See response 1.a., above. Eckart is a manufacturer of metal effect pigments in powder, paste and pellet form as well as metallic concentrates, dispersions, printing inks and pearlescent pigments. Further explanation of Eckart, its processes, and operations can be found on its website at: <http://www.eckart.net/>.

Eckart's commonly manufactured products include: automotive coatings, industrial coatings, powder coatings, and cosmetics. Typical materials used include: copper, zinc, organic solvents, UV monomers and oligomers. Detailed descriptions of Eckart products and formulations can be found at: <http://www.eckart.net/service/formulations.html>. Through use of the drop-down "service" menu, the formulations of Eckart products can be found in convenient PDF form.

Company's Relationship to Superior Barrel and Drum ("SBD")

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

Response: After investigation of the Eckart's internal customer and product databases, neither Eckart, nor any Eckart facility, has conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers. Additionally, Eckart has

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reviewed active and inactive vendor data, supplier data, and interviewed tenured employees, all of which indicated no business involvement with Superior Barrel and Drum.

In efforts to go above and beyond the information requests contained herein, Eckart conducted extensive inquiries into the one (1) drum that was purported to have been present at the SBD site. After Ms. Bonnie Hriczko, US EPA Enforcement Specialist, provided field analysis and pictures of the non-hazardous drum (attached as Exhibit A), Eckart quickly investigated the identifying numbers on the drum.

Using the material lot number and customer P.O. number, Eckart acquired the shipping confirmation, packing list, invoice, and proof of payment (attached as Exhibit B). All of the documentation shows a sale and delivery to Wikoff Color, of Sharon Hill, Pennsylvania. Eckart has no other documentation or indication that the drum was sent to any other entity, including Superior Barrel and Drum or returned to Eckart. After sold and transported to Wikoff, Eckart has no other knowledge of the single 55 gallon drum. The contents of the drum was ROTOSTAR® Aqua 415 Rich 1501-11 (see attached MSDS Sheet as Exhibit C).

- b. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company.

Response: As described in the Response to Question 3.a., Eckart has no relationship with SBD, has not rendered any services or products, and as such, has no corresponding documentation or information regarding this request.

- c. Provide copies of any contracts or agreements between the Company and SBD.

Response: As described in the Response to Question 3.a., Eckart has no contract or agreement with SBD, and as such, has no corresponding documentation or information regarding this request.

4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated.

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Response: As described in the Response to Question 3.a., no Eckart facility has conducted business with SBD, and as such, has no corresponding documentation or information regarding this request.

- b. State the name, address, and current RCRA Identification Number of each facility.

Response: As described in the Response to Question 3.a., no Eckart facility has conducted business with SBD, and as such, has no corresponding documentation or information regarding this request.

5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.

- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- b. Identify the number of Containers that were the subject of each such transaction.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.).

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company

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products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.)

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information.

- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

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7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, can provide no identity of persons who have knowledge or responsibility regarding a transaction with SBD.

As described in the Response to Question 3.a., Eckart documentation shows a sale and delivery to Wikoff Color, of Sharon Hill, Pennsylvania. Eckart has no other documentation or indication that the drum was sent to any other entity, including Superior Barrel and Drum, or returned to Eckart.

8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:

- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

- b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Response: As described in the Response to Question 3.a., Eckart has conducted no transactions with SBD, and as such, has no corresponding documentation or information regarding this request.

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As described in the Response to Question 3.a., Eckart documentation shows a sale and delivery of product to Wikoff Color, of Sharon Hill, Pennsylvania. Attached as Exhibit C are the Material Safety and Data Sheets for the product sold and delivered to Wikoff Color, of Sharon Hill, Pennsylvania.

9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

Response: As described in the Response to Question 3.a., Eckart has no other documentation or information in response to this request, and as such, has no corresponding documentation or information regarding this request.

10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Response: As described in the Response to Question 3.a. above, Eckart has had no transactions with SBD, and as such, has sent no containers to SBD via third party transporter.

As described in the Response to Question 3.a., Eckart documentation shows a sale and delivery of product to Wikoff Color, of Sharon Hill, Pennsylvania. See Exhibit B for information regarding the transporter used for sale and delivery of product to Wikoff Color, of Sharon Hill, Pennsylvania.

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

Response: Anthony J. Ameo Jr., President & CEO
Mark Wallace, Vice President & CFO
Gilles Legare, Head of Operations, Bronze & Ink
Carol March, Executive Assistant

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12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title(s) and a description of the responsibilities.

Response: Eckart has no other documentation or information in response to this request.

13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

Response: Eckart has no documentation or information regarding other sources that disposed of or transported Containers to the Site. As described in the Response to Question 3.a., Eckart documentation shows a sale and delivery of product to Wikoff Color, of Sharon Hill, Pennsylvania. See, Exhibit B.

Since Eckart has no records of a shipment of any finished or raw product, or waste, to the Superior Barrel Site, nor arranged by contract, agreement or otherwise to transfer any product or waste to the Superior Barrel Site, for any purpose including those purposes defined by CERCLA, it is Eckart's opinion, based on our analysis and investigation of available records, that Eckart should not be categorized as a responsible party under CERCLA.

This response contains all information and data that pursuant to the investigation performed by Eckart. It is our sincere hope that the above satisfies all necessary inquiries from the U.S. EPA and no further action or response will be required.

If there are any questions, please do not hesitate to contact me.

Sincerely,



Eckart America Corporation (Altana)

cc: William Tucker, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

Ms. Bonnie Hriczko
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CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of Ohio
County of Lake

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

ANTHONY J. ALLO JR

NAME (print or type)

PRESIDENT & CEO

TITLE (print or type)


SIGNATURE

Sworn to before me this 12
Day of MAR 2014


Notary Public



COL1997 248424v10
31437.00049

LINDA M. FERRATO
NOTARY PUBLIC • STATE OF OHIO
Recorded in Lake County
My commission expires Aug. 22, 2016



Drum Inventory Log

Drum number 2120
Project Number 1865
Page _____ of _____

Project Location SUPERIOR BAYVIEW & DRUM Logger _____ Date _____
Project Contact GARY BELAND Sampler _____ Time _____
Phone 404-242-6014 Weather _____

Drum Type: Fiber ☐ Poly-Lined ☐ Steel ☒ Poly ☐ Stainless Steel ☐ Nickel ☐
Lid Type: Ringtop ☒ Closed Top ☐ BUNGIE
Drum Condition: Meets DOT Specs ☐ Good ☐ Fair ☐ Poor ☒
Drum Size: 110 ☐ 85 ☐ 55 ☒ 42 ☐ 30 ☐ 18 ☐ 10 ☐ 5 ☐ Other _____
Drum Contents: Volume: Full ☐ 3/4 ☐ 1/2 ☐ 1/4 ☐ <1/4 ☐ Empty ☐
Overpacked: No ☒ Yes ☐ Overpack Type: Fiber ☐ Steel ☐ Poly ☐ _____

Physical State					Color	Clarity			Layer Thickness	Field Analysis	
Layers	Liquids	Solids	Gel	Sludge	Use Standard Colors	Clear	Cloudy	Opaque		pH	SU
T			✓		gray			✓	100%		
M											
B											

Field Analysis: PID 256 ppm
Dosimeter _____
Other _____

Drum Labels / Markings
DOT Haz _____ UN / NA _____

Manufacturer's Name ECKART
Chemical Name _____
Additional Information _____ 9/25/13

☐ Laboratory Compatibility Data
Mark if physical state and color matches the above information. If not, stop analysis and notify project contact. Further work will not be paid for.

Compatibility CAT: CBS/NL/NL
Analysts: LM
Date Performed: 9/25/13 TH

Radiation: Pos ☐ Neg ☐ _____ MREM / Hr

	Physical State				Color	Clarity			Water Solubility	React	pH	Hex. Sol.	Per	Oxid	CN	Sul	Biol-stain	Flash Point	PCBs (25ppm)	PCB Test Comp
Layers	Liquids	Solids	Gel	Sludge	Use Standard Colors	Clear	Cloudy	Opaque	Solubility SPSI Density H or L	A=Air W=Water	Std. Unit	S or I	+ or -	+ or -	+ or -	+ or -	+ or -	<60°C	+ or -	Number
T			✓		gray			✓	I	N/A	6	S	-	-	-	-	-	C	-	-
M	✓				brown		✓		S	I	I	I	-	-	-	-	-	-	-	-
B	✓				gray			✓	S	I	I	I	-	-	-	-	-	-	-	-

Comments: _____
PCB Conc. _____ ppm Flash Point _____ °C Compatibility Comp. Bulk # OS/NL/NL
Data Reviewer: _____ Data Review Date: _____
Field Reviewer: _____ Field Review Date: _____

Transfer Number	Transfers Relinquished by	Transfers Accepted by	Date	Time
1				
2				
3				



ECKART AMERICA CORPORATION
830 E. ERIE STREET
PAINESVILLE, OH 44077
800-556-1111

SHIPPING CONFIRMATION

ATTENTION: ROBERT
FAX: 484-494-4730
PHONE: 484-494-4530
DATE: 02/06/2014

BILL TO:
76292
WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

SHIP TO:
76292-1
WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

SALES ORDER NO.	PO NO	ORDER DATE	CSR / DIVISION						
182562	21910RJP	02/19/10	Lisa M Canfield Graphic Arts						
INVOICE NO	PRODUCT DESCRIPTION/UOM/PACKAGE SIZE	CUST CODE	QTY SHIPPED	LOT	SHIP DATE	FREIGHT			Warehouse
						TERMS	SERVICE	CARRIER PRO NO	
192757	ROTOSTAR® AQUA 415 RICH 1501-11 EA 550LB		1,650.00 LB	10-56817	02/23/10	PREPAID	GROUND	ADPYLE 154 066-971	121 PERRY, OH
192757	ROTOSTAR® AQUA 415 PALE 1502-21 EA 550LB		1,650.00 LB	10-56818	02/23/10	PREPAID	GROUND	ADPYLE 154 066-971	121 PERRY, OH

Notes:

Your order was shipped as noted above. If you have any questions, please contact Customer service at 1-800-556-1111 immediately.

Signature _____

A member of ALTANA





Exhibit A - 3

ECKART
Effect Pigments

ECKART AMERICA CORPORATION
24-hour Emergency Contact: CHEMTREC: 800-424-9300

Constituent
Copper
Zinc
Isopropyl Alcohol

CAS Number	Concentration
7440-50-8	20.00 - 30.00 %
7440-66-6	2.50 - 10.00 %
67-63-0	1.00 - 2.00 %

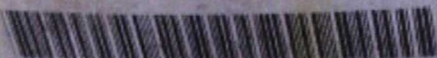
Handling Procedures

Avoid contact with eyes.
Keep the container dry.
Store in a closed container when not in use.
Keep in a well-ventilated place.
Wear eye protection.
Wear respiratory protection.
Do not breathe dust/fume/gas/aerosol.
Avoid contact with skin and eyes.
Wash thoroughly after handling.
Use personal protective equipment as required.
Do not get the material in contact with skin.
Avoid prolonged exposure.
Use only well-ventilated containers.
Do not get on clothing or in eyes.
Do not get on face or in mouth.

First Aid

INHALATION: If inhaled, remove from exposure and move to fresh air. If breathing is difficult, use oxygen. If breathing is not difficult, use fresh air.
EYES: If eyes are contacted, flush with water for at least 15 minutes. If irritation persists, get medical attention.
SKIN: If on skin, wash with soap and water. If irritation persists, get medical attention.
INGESTION: If swallowed, do not induce vomiting. Get medical attention.
DO NOT USE VEHICLES OR OTHER MEANS OF TRANSPORT TO TRANSPORT THIS PRODUCT.
DO NOT USE VEHICLES OR OTHER MEANS OF TRANSPORT TO TRANSPORT THIS PRODUCT.

ROTOSTAR® AQUA 415 RICH 1501-11



RSA150111-550LB

Lot/Batch No:



10-56817

Net Weight:



550.00 LB

Article # U2349
NOT REGULATED (INK LIQUID)

P.O. Number:



21B10RJP

HEALTH	1
REACTIVITY	0
PERSONAL PROTECTION	0

ALL OTHER INFORMATION
A PRODUCT OF ECKART
Eckart America Corporation
P.O. Box 10000
St. Louis, MO 63110-0000
USA
Tel: (314) 291-1000
Fax: (314) 291-1001
E-mail: info@eckart.com
Web: www.eckart.com

Packing List

2/6/2014

ECKART AMERICA CORPORATION
P.O. BOX 747
830 EAST ERIE STREET
PAINESVILLE, OH 44077
USA
Tel: 440-954-7600
Fax: 440-354-6224



Bill To
76292
WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

Ship To
76292-1
WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

Order Date: 2/19/2010
Promised Date: 2/23/2010
Customer P.O. 21910RJP

Branch 04
Whs: 121

Sales Order No 182562

Sales Type: ORDER

Hold: No

Ordered Qty	Product Description	Picked Qty	Lot No	Status
1	ROTOSTAR AQUA 415 RICH 1501-11			
3.00 EA				
1,650.00 LB	Code 1.A9090700			IN
		3.00 EA	1,650.00 LB	10-56817
				Hold: No
2	ROTOSTAR AQUA 415 PALE 1502-21			
3.00 EA				
1,650.00 LB	Code 1.A9090690			IN
		3.00 EA	1,650.00 LB	10-56818
				Hold: No

Booking #

Vessel #

A member of ALTANA

Exhibit B - 2

INVOICE

INVOICE NO. 192757

CUSTOMER NO. 76292

SOLD TO: WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

SHIP TO: WIKOFF COLOR - SHARON HILL PA
950 CALCON HOOK RD
A9 TOWNSHIP SQUARE
SHARON HILL, PA 19079
USA

INVOICE DATE 02/23/2010		SHIPPED VIA ADPYLE REG GROUND SERVICE		FCA SHARON HILL, PA		TERMS NET 30 DAYS	
P.O. NUMBER 21910RJP		ORDER DATE 02/19/2010		SALES ORDER NO. 182562		SALESPERSON 705 LUKENS GA MIDATLANTIC	
FREIGHT PREPAID		QUANTITY		DESCRIPTION		UNIT PRICE	
Ordered	Shipped	Back Ordered					
1,650 LB	1,650 LB	0 LB	ROTOSTAR® AQUA 415 RICH 1501-11		\$4.1100/LB		\$6,781.50
		Shipped 02/23/2010		550LB			
1,650 LB	1,650 LB	0 LB	ROTOSTAR® AQUA 415 PALE 1502-21		\$4.1100/LB		\$6,781.50
		Shipped 02/23/2010		550LB			

*** Total ***

\$13,563.00

Please Remit To :
ECKART AMERICA CORPORATION
25128 Network Place, Chicago, IL 60673-1128

ECKART AMERICA CORPORATION
P.O. BOX 747
830 EAST ERIE STREET
PAINESVILLE, OH 44077 USA
Tel: 440-954-7800
Fax: 440-354-8224

Page 1 of 1

A member of  ALTANA

THIS INVOICE IS SUBJECT TO THE TERMS AND CONDITIONS SPECIFIED ABOVE AS WELL AS THE TERMS & CONDITIONS OF SALE MADE AVAILABLE ON THE ECKART WEBSITE AT <http://www.eckart.net/company/locationssubsidiaries/eckart-america/terms-conditions-of-sale.html>

Exhibit B - 3

70249

Exhibit B - 4

THIS DOCUMENT HAS A VOID PANTOGRAPH, MICROPRINTING AND AN ARTIFICIAL WATERMARK

WikoffColor
CORPORATION

Wikoff Color Corp US
1986 Merritt Road
Fort Mill, SC 29716



WACHOVIA

Wachovia Bank of South Carolina, N.A.
Rock Hill, SC 29730

CHECK

429936

DATE

3/17/2010

AMOUNT

\$31,939.91

PAY Thirty one thousand nine hundred thirty nine and 91/100 Dollars

TO THE
ORDER
OF

Eckart America Corp
PO Box 71369
Cleveland, OH 44191-0569

Tim M. Lile

AUTHORIZED SIGNATURE

⑈429936⑈ ⑆053207766⑆ 2003701040856⑈

CHECK

429936

Reference Number	Reference Date	Description	Gross	Discount	Net
IN192586	2/19/2010	02/10	1,126.12	0.00	✓ 1,126.12
IN192731	2/23/2010	02/10	370.40	0.00	✓ 370.40
IN192813	2/24/2010	02/2010	7,359.30	0.00	7,359.30
IN192522	2/18/2010	02/10	370.40	0.00	✓ 370.40
IN192637	2/22/2010	02/10	1,085.70	0.00	✓ 1,085.70
IN192530	2/18/2010	02/10	7,585.60	0.00	✓ 7,585.60
IN192647	2/22/2010	02/10	479.39	0.00	✓ 479.39
IN192757	2/23/2010		13,563.00	0.00	13,563.00
3/17/2010			31,939.91	0.00	31,939.91

1. Product and Company Identification

Product name	ROTOSTAR® AQUA 415 RICH 1501-11	
Distributor	Eckart America Corporation 830 East Erie Street Painesville, OH 44077-0747	Revision # 2 Revision date 10-Feb-2011
Emergency Contact, CHEMTREC	800-424-9300 1-703-527-3887 (International)	
General Assistance	866-458-7837	

2. Hazards Identification

Emergency overview Harmful in contact with eyes. Prolonged exposure may cause chronic effects. This product is not considered to be a carcinogen by IARC, ACGIH, NTP, or OSHA.

Potential short term health effects

Skin	Avoid contact with the skin.
Eyes	Contact may irritate eyes. Avoid contact with eyes.
Inhalation	Do not breathe dust/fume/gas/mist/vapors/spray.
Target organs	Eyes. Kidney. Liver. Respiratory system. Skin.
Main symptoms	Irritation.

3. Hazardous Materials / Information on Ingredients

Component	Wt. %	CAS #
Copper	20 - 30	7440-50-8
Zinc	10 - 20	7440-66-6
Isopropyl Alcohol	1 - 2	67-63-0

4. First Aid Measures**First aid procedures**

Eye contact	Get medical attention if irritation develops or persists. Immediately flush eyes with plenty of water for at least 15 minutes.
Skin contact	Wash off with warm water and soap. Get medical attention if irritation develops or persists.
Ingestion	If ingestion of a large amount does occur, seek medical attention.
General advice	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

5. Fire Fighting Measures

Flash point	Not available
Auto-ignition temperature	1256 °F (680 °C) (calculated)
Suitable extinguishing media	Dry powder.
Unusual fire & explosion hazards	Not a fire hazard. The product is not flammable.

Hazardous combustion products May include oxides of oxides of carbon.

6. Accidental Release Measures

Personal precautions Ensure adequate ventilation.

Methods for cleaning up Never return spills in original containers for re-use. Use a non-combustible material like vermiculite, sand or earth to soak up the product and place into a container for later disposal. Wipe up with absorbent material (e.g. cloth, fleece).

Containment procedures This material is a water pollutant and should be prevented from contaminating soil or from entering sewage and drainage systems and bodies of water.

7. Handling and Storage

Handling Avoid contact with skin and eyes. Avoid contact with eyes. Avoid prolonged exposure. Use only with adequate ventilation. Wash thoroughly after handling.

Storage Keep container tightly closed. Store in cool place. Keep in a well-ventilated place.

8. Exposure Controls / Personal Protection

Engineering measures to reduce exposure Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits.

Personal protective equipment

Eye protection Wear safety glasses with side shields.

Skin and body protection Wear suitable protective equipment. Wear suitable protective clothing.

Respiratory protection Use personal protective equipment as required. When workers are facing concentrations above the exposure limit they must use appropriate certified respirators.

Hygiene measures Keep away from food and drink. Avoid contact with skin, eyes and clothing.

Hand protection Protective gloves.

Exposure limits

ACGIH - Threshold Limits Values - Short Term Exposure Limits (TLV-STEL)

Isopropyl Alcohol	67-63-0	400 ppm STEL
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ACGIH - Threshold Limits Values - Time Weighted Averages (TLV-TWA)

Copper	7440-50-8	0.2 mg/m3 TWA (fume); 1 mg/m3 TWA (dust and mist, as Cu)
Isopropyl Alcohol	67-63-0	200 ppm TWA

U.S. - OSHA - Final PELs - Time Weighted Averages (TWAs)

Copper	7440-50-8	0.1 mg/m3 TWA (fume); 1 mg/m3 TWA (dust and mist)
Isopropyl Alcohol	67-63-0	400 ppm TWA; 980 mg/m3 TWA

9. Physical & Chemical Properties

Form Liquid.

Boiling point 212 °F (100 °C) (calculated)

Density 12.25 lbs/gal (calculated)

Specific gravity 1.47 (Calculated)

Volatile organic - wt. % 2.56 % Weight (calculated)

10. Chemical Stability & Reactivity Information

Stability Stable at normal conditions.

Incompatibility Caustics. Strong oxidizing agents. Water. Reacts violently with oxidizer. Will ignite itself if exposed to air.

11. Toxicological Information**Routes of exposure****NIOSH - Pocket Guide - Target Organs**

Copper	7440-50-8	respiratory system, skin, liver, kidneys, eyes (dust and mist)(increased risk with Wilson's disease)
Isopropyl Alcohol	67-63-0	eyes, skin, respiratory system

Carcinogenicity Not expected to be hazardous by OSHA criteria.

Sensitization Not expected to be hazardous by OSHA criteria.

Acute toxicity Acute LD50: 52431.47 mg/kg, Rat, Oral
Acute LC50: 2237 mg/l/4h estimated, Rat, Inhalation

Toxicology Data - Selected LD50s and LC50s

Isopropyl Alcohol	67-63-0	Inhalation LC50 Rat: 72.6 mg/L/4H; Oral LD50 Rat: 4396 mg/kg; Dermal LD50 Rat: 12800 mg/kg; Dermal LD50 Rabbit: 12800 mg/kg
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Chronic toxicity Hazardous by OSHA criteria. Prolonged exposure may cause chronic effects.

Local effects Contact may irritate or burn eyes.

Reproductive toxicity Not expected to be hazardous by OSHA criteria.

Symptoms and target organs**NIOSH - Pocket Guide - Target Organs**

Copper	7440-50-8	respiratory system, skin, liver, kidneys, eyes (dust and mist)(increased risk with Wilson's disease)
Isopropyl Alcohol	67-63-0	eyes, skin, respiratory system

12. Ecological Information

Ecotoxicity IC50 40774 mg/L, Algae, 72.00 Hours,
Components of this product have been identified as having potential environmental concerns.

13. Disposal Considerations

Disposal instructions Dispose in accordance with all applicable regulations. This product, in its present state, when discarded or disposed of, is not a hazardous waste according to Federal regulations (40 CFR 261.4 (b)(4)). Under RCRA, it is the responsibility of the user of the product to determine, at the time of disposal, whether the product meets RCRA criteria for hazardous waste.

14. Transport Information

DOT

Not regulated.

IATA

Not regulated.

IMDG

Not regulated.

General

DOT Regulated Marine Pollutant.

15. Regulatory Information**Inventories**

Country(s) or region	Inventory name	On inventory
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	Yes
China	Inventory of Existing Chemical Substances in China (CCS)	No
Europe	European Inventory of New and Existing Chemicals (EINECS)	Yes
Europe	European List of (ELINCS)	No
Japan	Japanese Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Korean Inventory of Chemicals (KICS)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
All components are on the U.S. EPA TSCA Inventory List.

U.S. - CERCLA/SARA - Hazardous Substances and their Reportable Quantities

Component	CAS #	Data Value
Copper	7440-50-8	5000 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is larger than 100 micrometers); 2270 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is larger than 100 micrometers)
Zinc	7440-66-6	1000 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is larger than 100 micrometers); 454 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the solid metal released is larger than 100 micrometers)

U.S. - CERCLA/SARA - Section 313 - Emission Reporting

Component	CAS #	Data Value
Copper	7440-50-8	1.0 % de minimis concentration
Isopropyl Alcohol	67-63-0	1.0 % de minimis concentration (only if manufactured by the strong acid process, no supplier notification)
Zinc	7440-66-6	1.0 % de minimis concentration (dust or fume only)

State regulations **WARNING:** This product contains a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

U.S. - Massachusetts - Right To Know List

Copper	7440-50-8	Present
Isopropyl Alcohol	67-63-0	Present
Zinc	7440-66-6	Present

U.S. - New Jersey - Right to Know Hazardous Substance List

Copper	7440-50-8	sn 0528
Isopropyl Alcohol	67-63-0	sn 1076; sn 2381 (strong-acid process manufacture)
Zinc	7440-66-6	sn 2021 (dust and fume)

U.S. - Pennsylvania - RTK (Right to Know) List

Copper	7440-50-8	Environmental hazard
Isopropyl Alcohol	67-63-0	Environmental hazard
Zinc	7440-66-6	Environmental hazard

U.S. - Rhode Island - Hazardous Substance List

Copper	7440-50-8	Toxic
Isopropyl Alcohol	67-63-0	Toxic; Flammable
Zinc	7440-66-6	Flammable

Superfund Amendments and Reauthorization Act of 1986 (SARA)

**Section 302 Extremely
Hazardous Substance**

**Section 311
Hazardous Chemical**

Hazard Categories Immediate Hazard - No
 Delayed Hazard - Yes
 Fire Hazard - No
 Pressure Hazard - No
 Reactivity Hazard - No

HMS ratings	Health	1*
	Flammability	0
	Reactivity	0

16. Other Information

Issue date 10-Feb-2011

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Replaces sheet dated 23-Sep-2009

Glossary of abbreviations

ACGIH = American Conference of Governmental Industrial Hygienists
C9 = Nine Carbons
CAS = Chemical Abstracts Service
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
CFR = Code of Federal Regulations
DOT = Department of Transportation
gm/kg = grams per kilograms
HMIS = Hazardous Materials and Information System
IARC = International Agency for Research on Cancer
LC = Lethal Concentration
LD = Lethal Dose
LEL = Lower Explosive Limit
mg/m³ = milligrams per cubic meter
mg/kg = milligrams per kilograms
mg/l = milligrams per liter
mmHg = millimeters of mercury
MSHA = Mine Safety and Health Administration
N/A = Not Applicable
ND = Not Determined
NIOSH = National Institute for Occupational Safety and Health
NTP = National Toxicology Program
TWA = Time Weighted Average
OSHA = Occupational Safety and Health Administration
PELs = Permissible Exposure Limits
ppm = parts per million
RCRA = Resource Conservation and Recovery Act
SARA = Superfund Amendments and Reauthorization Act
STEL = Short Term Exposure Limit
TLVs = Threshold Limit Values
TSCA = Toxic Substances Control Act
UEL = Upper Explosive Limit
UN = United Nations
VOC = Volatile Organic Compound
WHMIS = Workplace Hazardous Materials Information System

UNITED STATES POSTAL SERVICE



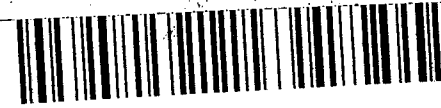
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Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko
U.S. Environmental Protection Agency
Removal Action Branch-(MS-211)
Building 205
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

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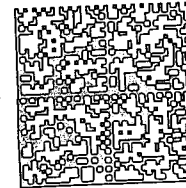
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ATTORNEYS

88 EAST BROAD STREET
SUITE 1600
COLUMBUS, OHIO 43215-3581

Via Certified Mail/Return Receipt Requested

Ms. Bonnie Hriczko
Removal Action Branch, US EPA, Region II
2890 Woodbridge Avenue, MS-211
Edison, NJ 08837



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